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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

AMERICAN PREPARATORY SCHOOLS,
INC., a Utah Corporation,

Plaintiff,

vs.

NEVADA CHARTER ACADEMIES d/b/a
AMERICAN PREPARATORY ACADEMY—
LAS VEGAS, a Nevada Corporation,
RACHELLE HULET, an individual,

Defendants.

Case Number:
2:20-cv-01205-JAD-NJK

**STIPULATION AND ORDER TO
CONTINUE STAY OF ALL
PROCEEDINGS TO FINALIZE
SETTLEMENT**

(FIRST REQUEST)

ECF No. 98

Plaintiff American Preparatory Schools, Inc. (“Plaintiff”), by and through its counsel of record, the law firms of Parr Brown Gee & Loveless and the Takos Law Group, LTD., Defendant Nevada Charter Academies d/b/a American Preparatory Academy – Las Vegas (“APA”), by and through its counsel of record, the law firms of Lipson Neilson P.C. and Hayes Wakayama, and Defendant Rachelle Hulet (“Hulet”), by and through her counsel of record, the law firm of Hogan Hulet, (collectively the “Parties”), hereby stipulate and agree as follows:

1. On May 13, 2021, this Court granted a Stipulation and Order to Extend Time for Filing of Responses to Third Amended Complaint and Stay All Proceedings to Finalize Settlement

(Fifth Request) which stayed all proceedings in this matter through September 9, 2021 [ECF No. 97].

2. The Parties had requested a stay of proceedings since they had engaged in meaningful settlement discussions to resolve all claims asserted, and not yet asserted, and had started to draft the settlement documents.

3. The Parties are now requesting more time to finalize the settlement documents because the contemplated transactions are very complex requiring the input of tax, bonding and other professionals.

4. Therefore, the Parties request that the stay of this matter be continued in order to finalize the settlement documents for an additional ninety (90) days.

5. This is the first submission of a stipulation to continue the stay of these proceedings.

IT IS SO STIPULATED

Dated this 10th day of September, 2021

Dated this 9th day of September, 2021

TAKOS LAW GROUP, LTD.

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By: /s/ Zachary P. Takos, Esq.

By: /s/ Liane K. Wakayama, Esq.

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Attorneys for Plaintiff American

Preparatory Schools, Inc.

1 Dated this 9th day of September, 2021

Dated this 9th day of September, 2021

2 **LIPSON NEILSON P.C.**

HOGAN HULET

3 By: /s/ Lisa J. Zastrow, Esq.

By: /s/ Kenneth E. Hogan, Esq.

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10 *Academy – Las Vegas*

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12 **ORDER**

13 Based on the parties' stipulation [ECF No. 98] and good cause appearing, IT IS HEREBY
14 ORDERED that the stay is extended to 12/9/21.

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17 U.S. District Judge Jennifer A. Dorsey
18 Dated: September 13, 2021
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